

**U.S. Bankruptcy Court
Eastern District of Michigan (Detroit)
Bankruptcy Petition #: 13-53846-swr**

Date filed: 07/18/2013

Assigned to: Judge Steven W. Rhodes
Chapter 9
Voluntary
No asset

Debtor In Possession
City of Detroit, Michigan
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Detroit, MI 48226
WAYNE-MI
Tax ID / EIN: 38-6004606

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Filing Date	#		Docket Text
06/17/2014		<u>5358</u>	Motion of Creditors to View Or, in the Alternative, Unseal Supplemental Order Regarding Mediation Confidentiality Filed by Interested Parties Syncora Capital Assurance Inc., Syncora Guarantee Inc. (Attachments: # <u>1</u> Exhibit 1 – Proposed Order [Not Included] # <u>2</u> Exhibit 2 – Notice of Motion and Opportunity to Object # <u>3</u> Exhibit 3 – Brief [Not Required] # <u>4</u> Exhibit 4 – Certificate of Service [To be Filed] # <u>5</u> Exhibit 5 – Affidavits [Not Applicable] # <u>6</u> Exhibit 6 – Documentary Exhibits [State of Michigan Privilege Log] – Part I # <u>7</u> Exhibit 6 – Documentary Exhibit [State of Michigan Privilege Log] – Part II # <u>8</u> Exhibit 6 – Documentary Exhibit [State of Michigan Privilege Log] – Part III # <u>9</u> Exhibit 6 – Documentary Exhibit [State of Michigan Privilege Log] – Part IV) (Bennett, Ryan) (Entered: 06/17/2014)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)	
)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

**MOTION OF CREDITORS TO VIEW
OR, IN THE ALTERNATIVE, UNSEAL SUPPLEMENTAL ORDER
REGARDING MEDIATION CONFIDENTIALITY**

The undersigned creditors (collectively, the “Creditors”) respectfully submit this motion (this “Motion”) to view or, in the alternative, unseal the the *Supplemental Order Regarding Mediation Confidentiality* [Docket No. 5294] (the “Supplemental Order”) entered on June 12, 2014. In support of this Motion, the Creditors respectfully state as follows:

Preliminary Statement

1. On June 12, this Court entered an amendment or supplement to its original mediation order in the form of the Supplemental Order. The Creditors have not been provided with a copy of the Supplemental Order.

2. While the Creditors are mindful that certain sensitive information regarding this case’s mediation process may be protected from third parties not subject to the confidentiality obligations under the mediation order, the order

itself—together with its amendments, supplements, or subsequent versions—must be viewable at least by the mediation parties.

3. The Creditors, in particular, should be permitted to view the Supplemental Order for two reasons:

- **First**, the Creditors are mediation parties bound by the Court’s original mediation order (as may be amended, revised, or supplemented). In order to know what rights and obligations they may have as mediation parties—and to avoid any inadvertent waiver of their rights or failure to satisfy their obligations—the Creditors should be permitted to view the recently entered amendment or supplement.
- **Second**, other parties in this case, including the City, have recently asserted the “mediation privilege” to avoid responding to certain of the Creditors’ discovery requests and subpoenas. To understand whether any claimed privilege is valid and applicable and to determine how to respond, the Creditors must first understand the parameters of and the terms governing the mediation.

4. The transparency of the chapter 9 plan process is critical to ensure parties’ rights are protected as the Court considers confirmation of the City’s plan. The Creditors therefore respectfully request that they be permitted to view the

mediation order in its entirety, including the Supplemental Order, either on a confidential basis or, in the alternative, in connection with it being unsealed (if appropriate).

Jurisdiction and Venue

5. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b) and venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

6. By this Motion, the Creditors respectfully request to view the sealed Supplemental Order or, in the alternative and to the extent appropriate, that the Supplemental Order be unsealed.

Background

7. On August 13, 2013, this Court entered an order [Docket No. 322] (the “Original Mediation Order” and, as amended or supplemented, the “Mediation Order”) directing parties to submit to mediation. The Original Mediation Order states that “[a]ll proceedings, discussions, negotiation, and writings incident to mediation shall be privileged and confidential, and shall not be disclosed, filed or placed in evidence.” Original Mediation Order at 1.

8. On August 20, 2013 and September 3, 2013, the Court ordered the Creditors to submit to mediation under the Original Mediation Order [Docket Nos.

527, 704]. As a result, the Creditors are bound by the Original Mediation Order, including to the extent it is amended or supplemented by the Supplemental Order.

9. On June 12, 2014, this Court entered the Supplemental Order. Based on its title, the Supplemental Order appears to relate to “mediation confidentiality” but does not elaborate on its contents. The Creditors have not been provided with the Supplemental Order and could not obtain a copy through informal requests. As a result, the Creditors file this Motion.

Basis for Relief

I. The Creditors Should Be Allowed to View the Supplemental Order to Know Their Rights and Obligations as Mediation Parties.

10. As parties to the mediation in this case, the Creditors are bound by the Original Mediation Order—as it was originally entered and as it may be amended and supplemented. This Court’s sealed Supplemental Order appears, at a minimum, to supplement the Original Mediation Order (and also may amend it—there is no way for the Creditors to know).

11. Without viewing the Supplemental Order, the Creditors cannot know what their potential legal rights and obligations may be. Because the Creditors are mediation parties presumably bound by the Supplemental Order, the Creditors should be entitled to know what the Supplemental Order says.

II. The Creditors Should Be Allowed to View the Supplemental Order to Understand the Parameters of the Mediation Privilege (If Any).

12. As noted above, the City and other parties in this case have asserted the “mediation privilege” to avoid providing information requested in the Creditors’ discovery requests and subpoenas. *See, e.g., Joint Motion to Quash* at 10–11 [Docket No. 5300]; *Transcript of Hearing* at 267–68 (May 28, 2014); *State of Michigan Privilege Log* (attached hereto as **Exhibit 6**); *State of Michigan’s Response to Syncora’s Subpoena Duces Tecum* at 2 [Docket No. 3315]; *City of Detroit’s Objections and Responses to Syncora Capital Assurance Inc. and Syncora Guarantee Inc.’s First Request for the Production of Documents* at 2 [Docket No. 4479]. In fact, the so-called mediation privilege was asserted against certain of the Creditors’ discovery requests as recently as just last week (after entry of the Supplemental Order). *See Joint Motion to Quash* at 10–11 [Docket No. 5300].

13. Without viewing the entire mediation order (i.e., the Original Mediation Order, as amended or supplemented by the Supplemental Order), the Creditors cannot understand the parameters of the mediation in this case. And without understanding the parameters of the mediation, the Creditors cannot determine whether claims of any privilege are valid and cannot decide whether or how best to respond to them. Accordingly, to facilitate an efficient discovery process and afford all parties (the Creditors and the privilege-claiming parties) with

the rights (if any) to which they are entitled, the Creditors should be permitted to view the Supplemental Order.

Conclusion

14. For the reasons stated herein, the Creditors respectfully request that the Court (a) permit the Creditors to view the Supplemental Order or (b) in the alternative and to the extent appropriate, unseal the Supplemental Order.

[Remainder of page intentionally left blank.]

Dated: June 17, 2014

Respectfully submitted,

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Exhibit 1

Proposed Order

The Motion requests either of two alternative forms of relief. A proposed form of order will be provided promptly upon the Court's determination of which alternative relief (if any) to grant.

Exhibit 2

Notice of Motion and Opportunity to Object

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

)
) Chapter 9
)
) Case No. 13-53846
)
) Hon. Steven W. Rhodes
)

**NOTICE OF MOTION OF CREDITORS TO VIEW OR,
IN THE ALTERNATIVE, UNSEAL SUPPLEMENTAL
ORDER REGARDING MEDIATION CONFIDENTIALITY**

PLEASE TAKE NOTICE that on June 17, 2014, Syncora filed the *Motion of Creditors to View Or, in the Alternative, Unseal Supplemental Order Regarding Mediation Confidentiality* (the “Motion”) in the United States Bankruptcy Court for the Eastern District of Michigan (the “Bankruptcy Court”) seeking to allow the Creditors to view or, in the alternative, unseal the the *Supplemental Order Regarding Mediation Confidentiality* [Docket No. 5294] entered on June 12, 2014.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Motion or you want the Bankruptcy Court to consider your views on the Motion, by July 1, 2014, you or your attorney must:

1. File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:¹

United States Bankruptcy Court
Theodore Levin Courthouse
231 West Lafayette Street
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C.
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If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

¹ A response must comply with F. R. Civ. P. 8(b), (c) and (e).

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.

Dated: June 17, 2014

/s/ Ryan Blaine Bennett

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Exhibit 3

None [Brief Not Required]

Exhibit 4

Certificate of Service [To be filed separately]

Exhibit 5
Affidavits
[Not Applicable]

Exhibit 6

Documentary Exhibits [State of Michigan Privilege Log]

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Description
PRIV_000001						Notes to House of Representative re Mediation	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000002	Brader, Valerie	Lukasz Paszek	Valerie Brader (GOV)		4/15/2014	RE: Estimated Refree Stabilization Payments (including 20-year projections)	Common Interest Agreement	Document/Email containing communication with attorney
PRIV_000003	Brader, Valerie	Calley, Brian (GOV)	Valerie Brader (GOV)	Muchmore, Dennis (GOV); Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	RE: CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/Email containing communication with attorney; Document/Email discussing a subject incident to mediation
PRIV_000004	Brader, Valerie					Attachment: Draft City of Detroit Post Bankruptcy Oversight	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000005	Brader, Valerie					Attachment: Preliminary Draft Discussion Draft Pension Restructuring Proposal	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000006	Brader, Valerie					Attachment: Treatment of Provisions for Classes of Creditors	Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing attorney work product; Document/Email discussing a subject incident to mediation
PRIV_000007	Brader, Valerie					Attachment: PPT Slides for Presentation	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000008	Brader, Valerie				1/24/2014	Draft Senate House Bill	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000009	Brader, Valerie	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); lukasz@paszek.com; Priest, Chris (GOV); Gadola, Michael (GOV)	2/21/2014	LowIncomeModel Confidential - Subject to mediation order	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000010	Brader, Valerie	Agan, Jarrod (GOV); Priest, Chris (GOV)	Gadola, Michael (GOV)	Lukasz Paszek; Tedder, Greg (GOV); Brader, Valerie (GOV)	3/3/2014	RE: blog post on POA	Attorney Client Communication; Mediation	Document/Email containing communication with attorney; Document/Email discussing a subject incident to mediation
PRIV_000011	Brader, Valerie				1/21/2014	Draft 2 Detroit Settlement Conditions	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000012	Brader, Valerie				1/21/2014	Draft 2 Detroit Settlement Conditions	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000013	Brader, Valerie	Brook Swartzle; Brader, Valerie (GOV); Schneider, Matthew (AG); Jennifer Dettlorf	Gadola, Michael (GOV)	Brian Mills; Scott Starr; Travis Weber; Tedder, Greg (GOV)	3/3/2014	RE: Detroit	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000014	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Jennifer Dettlorf	Brook Swartzle	Brian Mills; Scott Starr; Travis Weber; Tedder, Greg (GOV)	3/3/2014	RE: Detroit	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000015	Brader, Valerie	Brook Swartzle	Schneider, Matthew (AG)	Gadola, Michael (GOV); Brader, Valerie (GOV); Jennifer Dettlorf; Brian Mills; Scott Starr; Travis Weber; Tedder, Greg (GOV)	3/3/2014	Re: Detroit	Attorney Client Communication; Mediation	Document/Email containing attorney work product
PRIV_000016	Brader, Valerie	Schneider, Matthew (AG)	Brook Swartzle	Gadola, Michael (GOV); Brader, Valerie (GOV); Jennifer Dettlorf; Brian Mills; Scott Starr; Travis Weber; Tedder, Greg (GOV)	3/3/2014	Re: Detroit	Attorney Client Communication; Mediation	Document/Email containing attorney work product
PRIV_000017	Brader, Valerie	Calley, Brian (GOV); Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/Email containing communication with attorney
PRIV_000018	Brader, Valerie	Brader, Valerie (GOV)	Tedder, Greg (GOV)		3/4/2014	FW: Detroit	Attorney Client Communication; Mediation	Document/Email containing communication with attorney
PRIV_000019	Brader, Valerie	Tedder, Greg (GOV)	Brader, Valerie (GOV)		3/4/2014	RE: Detroit	Mediation	Document/Email containing attorney work product
PRIV_000020	Brader, Valerie					Draft Disclosure Statement 36th District Court	Attorney Work Product; Mediation	Document/Email containing communication with attorney
PRIV_000021	Brader, Valerie	Schneider, Matthew (AG)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Steven G. Howell	3/5/2014	Re: Foundations	Attorney Client Communication; Mediation	Document/Email containing communication with attorney
PRIV_000022	Brader, Valerie					Draft Lazard Discussion Materials	Common Interest Agreement; Mediation	Document/Email discussing a subject incident to mediation
PRIV_000023	Brader, Valerie	Gadola, Michael (GOV)	Schneider, Matthew (AG)	Brader, Valerie (GOV); Steven G. Howell	3/5/2014	Re: Foundations	Attorney Client Communication; Mediation	Document/Email containing communication with attorney

Privileged Basis Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000024	Brader, Valerie					Proposed Structure for Income Stabilization	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000025	Brader, Valerie	Steven G. Howell	Gordon, Robert D.	Gadola, Michael (GOV); Schneider, Matthew (AG); Brader, Valerie (GOV); Bradley A. Robins; Eric Mendelsohn; Turner, Joseph E. Jr.; Michael J. VanOverbeke; King, Ronald A.; Jochen Schmitz	3/6/2014	FW: Detroit Mediation: 3/5/14 Materials (CONFIDENTIAL - Subject to FRE 408)	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000026	Brader, Valerie				3/5/2014	Value Gap Considerations	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000027	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Steven G. Howell	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/7/2014	Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/Email containing communication with attorney
PRIV_000028	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/Email discussing a subject incident to mediation
PRIV_000029	Brader, Valerie					Proposed Structure for Income Stabilization	Attorney Work Product; Mediation	Document/Email discussing a subject incident to mediation
PRIV_000030	Brader, Valerie	Brader, Valerie (GOV)	Sarah Griffin	Evan Miller; Heather Lennox; David G. Heiman; Mary M. Reil; sachs@millercaimfield.com	3/7/2014	Public Plan Governance Memo and Selective Survey / Proposed Trust Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/Email containing communication with attorney
PRIV_000031	Brader, Valerie				3/7/2014	Memo to V. Brader re public retirement systems	Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000032	Brader, Valerie					Trust Agreement Police and Fire Retirement System	Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing communication with attorney
PRIV_000033	Brader, Valerie					Public Plan Governance Memo and Selective Survey / Proposed Trust Agreement	Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing communication with attorney
PRIV_000034	Brader, Valerie	Clinton, Kevin (TREASURY); Sibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tracder, Greg (GOV); ork@delnolm.gov; mayes@delnolm.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); Stacy Fox	Jeffrey B Ellman	Charles M. Moore; gaurav.mahota@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Bennett	3/8/2014	City of Detroit Restructuring - Weekly E-Mail Update	Common Interest Agreement; Attorney Work Product	Document/Email containing attorney work product
PRIV_000035	Brader, Valerie				1/30/2014	Draft 2 Senate House Bill	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000036	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		3/11/2014	FW: Thoughts on pension fund returns and discount rates / Confidential - Subject to mediation order	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000037	Brader, Valerie	Steven G. Howell; Brader, Valerie (GOV); Schneider, Matthew (AG)	Gadola, Michael (GOV)	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/Email containing communication with attorney
PRIV_000038	Brader, Valerie	Gadola, Michael (GOV); Steven G. Howell; Schneider, Matthew (AG)	Brader, Valerie (GOV)	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/Email containing communication with attorney
PRIV_000039	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Steven G. Howell	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/Email containing communication with attorney
PRIV_000040	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000041	Brader, Valerie					Proposed Structure for Income Stabilization	Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000042	Brader, Valerie					MEIS Return Comparison	Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000043	Brader, Valerie	Steven G. Howell	Schneider, Matthew (AG)	Gadola, Michael (GOV); Brader, Valerie (GOV); Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	Re: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/Email containing attorney work product

Privileged Dates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000044	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie; Schneider, Matthew (AG)	Steven G. Howell	Kester K. So.; Peter H. Elsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/fenail containing attorney work product
PRIV_000045	Brader, Valerie	Schneider, Matthew (AG); Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV); Kester K. So.; Peter H. Elsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/fenail containing attorney work product
PRIV_000046	Brader, Valerie					MPERS Returns	Mediation	Document/fenail discussing a subject incident to mediation
PRIV_000047	Brader, Valerie					Conditions to Contribution by SOM	Mediation	Document/fenail discussing a subject incident to mediation
PRIV_000048	Brader, Valerie	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell; Clinton, Kevin (TREASURY)	Gadola, Michael (GOV)	Lukasz Paszek; Chris DeRose; Stoddard, Phil (DTMB)	3/12/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER - Discount Rate Background	Attorney Client Communication; Mediation	Document/fenail discussing a subject incident to mediation
PRIV_000049	Brader, Valerie	Steven G. Howell	Gadola, Michael (GOV)	Schneider, Matthew (AG); Brader, Valerie (GOV)	3/12/2014	RE: Prior to the Foundation Call...	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000050	Brader, Valerie	Gadola, Michael (GOV); Schneider, Valerie (GOV); Schneider, Matthew (AG)	Steven G. Howell	Kester K. So.; Peter H. Elsworth; Dawn R. Copley; Allison R. Bach	3/13/2014	Conditions & Exhibits 1 and 3	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000051	Brader, Valerie	Heather Lemox	Gadola, Michael (GOV)	Brader, Valerie (GOV); Steven G. Howell; Schneider, Matthew (AG)	3/14/2014	Conditions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/fenail containing communication with attorney; Document/fenail discussing a subject incident to mediation
PRIV_000052	Brader, Valerie					Exhibit 1 to Conditions to Contributions by SOM	Common Interest Agreement; Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000053	Brader, Valerie					Exhibit 3 to Conditions to Contributions by SOM	Common Interest Agreement; Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000054	Brader, Valerie					Confidential Term Sheet for Mediators' Proposal	Common Interest Agreement; Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000055	Brader, Valerie					Confidential Term Sheet for Mediators' Proposal	Mediation	Document/fenail discussing a subject incident to mediation
PRIV_000056	Brader, Valerie	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell; Kester K. So.	Gadola, Michael (GOV)	FW: Revised Term Sheet	3/17/2014	FW: Revised Term Sheet	Mediation	Document/fenail discussing a subject incident to mediation
PRIV_000057	Brader, Valerie	Heather Lemox	Brader, Valerie (GOV)	Steven G. Howell	3/18/2014	Revenue sharing	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	
PRIV_000058	Brader, Valerie	Gadola, Michael (GOV)	Dawn R. Copley	Brader, Valerie (GOV); Schneider, Matthew (AG); Peter H. Elsworth; Kester K. So.; Steven G. Howell	3/18/2014	FW: 36th District Court suggested revisions to Disclosure Statement and Plan of Adjustment	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	
PRIV_000059	Brader, Valerie					Draft Disclosure Statement 36th District Court	Common Interest Agreement	
PRIV_000060	Brader, Valerie	Brader, Valerie (GOV)	Heather Lemox	David G. Heiman; Evan Miller; Gadola, Michael (GOV); Schneider, Matthew (AG); Steven G. Howell	3/18/2014	RE: Conditions	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	
PRIV_000061	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV)	Brock Swartzle	Brian Mills; Travis Weber	3/20/2014	Bankruptcy	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney; Document/fenail discussing a subject incident to mediation
PRIV_000062	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/20/2014	FW: Plain Language Insert	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/fenail containing communication with attorney
PRIV_000063	Brader, Valerie				3/19/2014	Jones Day Draft Notice re: Proposed HealthCare Benefits	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/fenail containing attorney work product; Document/fenail containing communication with attorney
PRIV_000064	Brader, Valerie	Priest, Chris (GOV)	Brader, Valerie (GOV)	Lukasz Paszek	4/11/2014	RE: Estimated Refinee Stabilization Payments (including 20-year projections)	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney; Document/fenail discussing a subject incident to mediation

Privileged Dates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000065	Brader, Valerie	Kevin Orr; Allison R. Bach >; Dawn R. Cooley; Steven G. Howell; Mary M. Pail; Sarah Griffin; Gadda, Michael (GOV); Priest, Chris (GOV); lukasz.paszek.com	Brader, Valerie (GOV)	Evan Miller; Heather Lemox; Kenneth Sachs; Amanda Van Dusen	4/11/2014	RE: Revised IS terms	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing attorney work product; Document/Email containing communication with attorney; Document/Email discussing a subject incident to mediation
PRIV_000066	Brader, Valerie	Hanley, Farah (DTMB)	Priest, Chris (GOV)	Lukasz Paszek; Brader, Valerie (GOV)	2/4/2014	Subject to Mediation Order: Estimate of Cost Savings	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000067	Brader, Valerie				1/24/2014	Estimate of Straight Cut Decrease	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000068	Brader, Valerie	Clinton, Kevin (TREASURY); Sibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); ork@detromi.gov; mayes@detromi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Elman	Charles M. Moore; garav.mahotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lemox; Bruce Bennett	2/7/2014	City of Detroit Restructuring - Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	
PRIV_000069	Brader, Valerie	Brader, Valerie (GOV)	Gadda, Michael (GOV)		2/13/2014	FW: Mediators' Response	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000070	Brader, Valerie				2/10/2014	Memo to State Representatives re Mediator's Response	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000071	Brader, Valerie	Brader, Valerie (GOV)	Heather Lemox		9/13/2013	RE: "Confidential: Confidential Discussion Draft of Articles of Incorporation"	Attorney Client Communication; Attorney Work Product; Mediation	Document/Email containing attorney work product; Document/Email containing communication with attorney
PRIV_000072	Brader, Valerie	Brian L. Sedlak	Steven G. Howell	Heather Lemox; Brader, Valerie (GOV); Gadda, Michael (GOV); Schneider, Matthew (AG)	2/28/2014	RE: DIA Term Sheet	Attorney Client Communication; Mediation	Document/Email containing communication with attorney; Document/Email discussing a subject incident to mediation
PRIV_000073	Brader, Valerie				2/27/2014	Jones Day Comments to Mediator's Proposal	Mediation	
PRIV_000074	Brader, Valerie				2/27/2014	Confidential Term Sheet for Mediators' Proposal	Mediation	
PRIV_000075	Brader, Valerie	Brader, Valerie (GOV)	West, Samantha (GOV)		3/17/2014	FW: LowIncomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/Email containing communication with attorney; Document/Email discussing a subject incident to mediation
PRIV_000076	Brader, Valerie	Steven G. Howell; Brader, Valerie (GOV)	Heather Lemox		3/20/2014	FW: Plain Language Insert	Common Interest Agreement; Attorney Work Product	
PRIV_000077	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/Email discussing a subject incident to mediation
PRIV_000078	Brader, Valerie	Gadda, Michael (GOV) > Brader, Valerie (GOV)	West, Samantha (GOV)		3/21/2014	RE: File - DETROIT #1309357-45- Confidential Conditions to Contribution by State of Michigan-3.doc	Attorney Client Communication; Attorney Work Product; Mediation	Document/Email discussing a subject incident to mediation
PRIV_000079	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/Email discussing a subject incident to mediation
PRIV_000080	Brader, Valerie	Brader, Valerie (GOV); Stowell@tdjohnson-wright.com	Heather Lemox		3/21/2014	FW: CONFIDENTIAL: Draft Solicitation Documents	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/Email containing attorney work product; Document/Email containing communication with attorney
PRIV_000081	Brader, Valerie					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement; Attorney Work Product	Document/Email containing attorney work product
PRIV_000082	Brader, Valerie				3/21/2014	Jones Day Draft Notice re: Proposed HealthCare Benefits	Common Interest Agreement; Attorney Work Product	Document/Email containing attorney work product
PRIV_000083	Brader, Valerie					Pension/OPEB Tabulation Rules	Common Interest Agreement; Attorney Work Product	Document/Email containing attorney work product

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000084	Brader, Valerie					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement; Attorney Work Product	Document/femail containing attorney work product
PRIV_000085	Brader, Valerie					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement	
PRIV_000086	Brader, Valerie					Proposed Ballot	Common Interest Agreement; Attorney Work Product	Document/femail containing attorney work product
PRIV_000087	Brader, Valerie					Proposed Ballot	Common Interest Agreement; Attorney Work Product	
PRIV_000088	Brader, Valerie					Proposed Ballot	Common Interest Agreement; Attorney Work Product	Document/femail containing attorney work product
PRIV_000089	Brader, Valerie					Draft ELB Order	Common Interest Agreement; Attorney Work Product	Document/femail containing attorney work product
PRIV_000090	Brader, Valerie	Gerald Rosen; EdRiker	Gadola, Michael (GOV)	Brader, Valerie (GOV); Steven G. Howell	3/21/2014	Revised conditions	Attorney Work Product; Mediation	Document/femail containing attorney work product
PRIV_000091	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/femail discussing a subject incident to mediation
PRIV_000092	Brader, Valerie	Brader, Valerie (GOV)	Eisenheimer, Kevin (LARA)		3/21/2014	Fwd: Letter	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000093	Brader, Valerie	Brader, Valerie (GOV)	EDRiker	Gerald Rosen; Gadola, Michael (GOV)	3/21/2014	Re: LowincomeModel: Confidential - Subject to mediation order	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000094	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/22/2014	RE: LowincomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/femail discussing a subject incident to mediation
PRIV_000095	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/22/2014	RE: LowincomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/femail discussing a subject incident to mediation
PRIV_000096	Brader, Valerie	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV)	Dawn R. Copley	Steven G. Howell; Peter H. Ellsworth; Kester K. So; Allison R. Bach	3/22/2014	Comments to Disclosure Statement	Attorney Client Communication; Attorney Work Product	Document/femail containing attorney work product; attorney
PRIV_000097	Brader, Valerie	Clinton, Kevin (TREASURY); Stoltz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); ork@deloitte.com; Bill mays@deloitte.com; Bill Nowling; Celisse Ashley (TREASURY) > Brader, Valerie (GOV); stacy Fox	Jeffrey B Elman	Charles M. Moore; gaurav.mahotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Courne Ball; Heather Lennox; Bruce Bennett	3/23/2014	City of Detroit Restructuring - Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/femail containing attorney work product; Document/femail containing communication with attorney
PRIV_000098	Brader, Valerie	Brader, Valerie (GOV)	EDRiker	GadolaM@jud.state.mi.us; Gerald E. Rosen; Victoria Roberts; EDRiker	3/25/2014	Negotiations with Don Taylor	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000099	Brader, Valerie	Brader, Valerie (GOV)	EDRiker		3/25/2014	Re: Negotiations with Don Taylor	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000100	Brader, Valerie	Brader, Valerie (GOV)	Gaurav.Mahotra@ey.com	Or, Keyvin; David G. Heiman; hiennox@mesday.com	3/25/2014	Draft 40 Year projections	Attorney Client Communication; Common Interest Agreement	Document/femail containing communication with attorney
PRIV_000101	Brader, Valerie				2/24/2014	Draft FOA 40 Year projections	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000102	Brader, Valerie	Brader, Valerie (GOV)	EDRiker		3/25/2014	Re: Negotiations with Don Taylor	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000103	Brader, Valerie	Brader, Valerie (GOV)	Brader, Valerie (GOV)	West, Samantha (GOV)	3/25/2014	FW: CONFIDENTIAL - Detroit - Draft FinancialRestructuring Analyses	Attorney Client Communication; Mediation	Document/femail discussing a subject incident to mediation

Privileged Dates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000104	Brader, Valerie		Muchmore, Dennis (GOV)		1/30/2014	Preliminary Draft City of Detroit Ten Year Plan	Common Interest Agreement; Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000105	Brader, Valerie	Gadola, Michael (GOV)		Brader, Valerie (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000106	Brader, Valerie	Brader, Valerie (GOV)	Victoria Roberts	EDraker, Gerald, Rosen	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000107	Brader, Valerie	Dawn R. Copley	Schneider, Matthew (AG)	Gadola, Michael (GOV); Brader, Valerie (GOV); Kester K. So.; Peter H. Ellsworth; Steven G. Howell; Allison R. Bach	3/26/2014	Re: Potential pensioners claims against State	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000108	Brader, Valerie	Schneider, Matthew (AG); Dawn R. Copley	Gadola, Michael (GOV)	Brader, Valerie (GOV); Kester K. So.; Peter H. Ellsworth; Steven G. Howell; Allison R. Bach	3/26/2014	RE: Potential pensioners claims against State	Attorney Client Communication; Deliberative process	Document/fenail containing communication with attorney
PRIV_000109	Brader, Valerie	Brader, Valerie (GOV) <	Saxton, Thomas (Treasury)		3/26/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER - UTGO settlement	Mediation	Document/fenail discussing a subject incident to mediation
PRIV_000110	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV)	Steven G. Howell		3/27/2014	Refiree Committee	Attorney Client Communication	Document/fenail containing communication with attorney
PRIV_000111	Brader, Valerie	Steven G. Howell; Brader, Valerie (GOV)	Gadola, Michael (GOV)		3/27/2014	RE: Refiree Committee	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000112	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Steven G. Howell	3/27/2014	RE: Refiree Committee	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000113	Brader, Valerie	Brader, Valerie (GOV); Gadola, Michael (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Steven G. Howell	Peter H. Ellsworth; Kester K. So.; Dawn R. Copley	3/27/2014	Release	Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000114	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release Fw: #220358254-ACTIVE> - Detroit - City Revised Draft UTGO Term Sheet 3/25	Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000115	Brader, Valerie	Steven G. Howell; Brader, Valerie (GOV)	Heather Lemox		3/28/2014	#220358254-ACTIVE> - Detroit - City Revised Draft UTGO Term Sheet 3/25	Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000116	Brader, Valerie				3/25/2014	Term Sheet for Plan Treatment of UTGO Bond Claims	Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000117	Brader, Valerie				3/25/2014	Draft Term Sheet Plan Treatment of UTGO Bond Claims	Attorney Work Product; Mediation	
PRIV_000118	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/28/2014	RE: TARP funds	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000119	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/28/2014	RE: TARP funds	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000120	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/28/2014	Release/Income Stabilization	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000121	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000122	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000123	Brader, Valerie	Heather Lemox	Steven G. Howell	Brader, Valerie (GOV)	3/28/2014	Release/Income Stabilization	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney
PRIV_000124	Brader, Valerie	Steven G. Howell			3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document/fenail containing attorney work product
PRIV_000125	Brader, Valerie	Brader, Valerie (GOV)	Heather Lemox	Brader, Valerie (GOV)	3/28/2014	Re: Release/Income Stabilization	Attorney Client Communication; Common Interest Agreement; Mediation	Document/fenail containing attorney work product
PRIV_000126	Brader, Valerie	Brader, Valerie (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Woosley Scott; Gadola, Michael (GOV)	Muchmore, Dennis (GOV)	Schneider, Matthew (AG); Steven G. Howell	3/28/2014	RE: TARP funds	Attorney Client Communication; Mediation	Document/fenail containing communication with attorney; Document/fenail discussing a subject incident to mediation

Privileged Dates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000127	Brader, Valerie	"hlemox@jonesday.com"; tawson@jonesday.com	Dawn R. Copley	Schneider, Matthew (AG); Flancker, Steven (AG); Gaddia, Michael (GOV); Brader, Valerie (GOV); Steven G. Howell; Peter H. Ellsworth; Kester K. So; Allison R. Bach	3/28/2014	State's comments on Disclosure Statement and Plan	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document(s) containing attorney work product; Document(s) containing communication with attorney
PRIV_000128	Brader, Valerie	Clinton, Kevin (TREASURY); Sibitz, Bion (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); om@derotom.gov; mayss@derotom.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Elman	Charles M. Moore; gaurav.mahotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Barnett	3/29/2014	City of Detroit Restructuring - Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document(s) containing attorney work product; Document(s) containing communication with attorney
PRIV_000129	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000130	Brader, Valerie	Brader, Valerie (GOV)	Heather Lennox		3/31/2014	POA	Common Interest Agreement; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000131	Brader, Valerie	Brader, Valerie (GOV); SHowell@dickinson-wright.com	Heather Lennox		3/31/2014	FW: Amended Plan - with non-consensual and consensual releases (v13 against v12)	Common Interest Agreement; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000132	Brader, Valerie					Amended Plan v 13 against v 12	Common Interest Agreement; Attorney Work Product; Mediation	Document(s) containing attorney work product; Document(s) discussing a subject incident to mediation
PRIV_000133	Brader, Valerie					Amended Plan v 13	Common Interest Agreement; Attorney Work Product; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000134	Brader, Valerie					Amended Plan v 13	Common Interest Agreement; Attorney Work Product	Document(s) containing attorney work product; Document(s) discussing a subject incident to mediation
PRIV_000135	Brader, Valerie	Schneider, Matthew (AG); Gaddia, Michael (GOV); Brader, Valerie (GOV); Steven G. Howell; Peter H. Ellsworth; Flancker, Steven (AG); Saxton, Thomas (Treasury)	Kester K. So		3/31/2014	FW: UTGO - Cash flows (CONFIDENTIAL)	Common Interest Agreement; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000136	Brader, Valerie				3/31/2014	20 year DSA Calculation	Mediation	Document(s) discussing a subject incident to mediation
PRIV_000137	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/31/2014	FW: Amended Plan - with non-consensual and consensual releases (v13 against v12)	Attorney Client Communication; Common Interest Agreement; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000138	Brader, Valerie	Steven G. Howell; Brader, Valerie (GOV)	Heather Lennox		4/1/2014	Latest Plain English	Common Interest Agreement; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000139	Brader, Valerie					Jones Day Draft Notice re: Proposed HealthCare Benefits	Common Interest Agreement; Attorney Work Product; Mediation	Document(s) containing attorney work product; Document(s) discussing a subject incident to mediation
PRIV_000140	Brader, Valerie	Heather Lennox	Steven G. Howell	Brader, Valerie (GOV)	4/1/2014	State Draft Conditions - Confidential/Subject to Mediation Order	Common Interest Agreement; Mediation	Document(s) containing communication with attorney; Document(s) discussing a subject incident to mediation
PRIV_000141	Brader, Valerie				4/1/2014	Conditions to Contribution by SOM	Mediation	Document(s) discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000142	Brader, Valerie	Heather Lennox	Steven G. Howell	David G. Helman ; Evan Miller ; Brader, Valerie (GOV) ; Gadola, Michael (GOV)	4/1/2014	RE: IS Program	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000143	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/2/2014	FW: IS Program	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000144	Brader, Valerie	Gadola, Michael (GOV) ; Schneider, Matthew (AG) ; Peter H. Ellsworth ; Kester K. So ; Dawn R. Copley ; Allison R. Bach	Steven G. Howell	Brader, Valerie (GOV)	4/2/2014	FW: States Statement of Conditions	Mediation	Documental discussing a subject incident to mediation
PRIV_000145	Brader, Valerie					Conditions to Contribution by SOM	Mediation	Documental discussing a subject incident to mediation
PRIV_000146	Brader, Valerie	Brader, Valerie (GOV) ; Gadola, Michael (GOV) ; Schneider, Matthew (AG)	Steven G. Howell		4/5/2014	Foundations	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000147	Brader, Valerie	Brader, Valerie (GOV) ; Gadola, Michael (GOV) ; Showell@dickinson-wright.com	Heather Lennox		4/5/2014	FW: Conditions to State Contribution	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000148	Brader, Valerie	Heather Lennox	Steven G. Howell	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	4/5/2014	Re: Conditions to State Contribution	Mediation	Documental discussing a subject incident to mediation
PRIV_000149	Brader, Valerie	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	Steven G. Howell		4/5/2014	Issue re Pensions	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000150	Brader, Valerie	Steven G. Howell ; Brader, Valerie (GOV) ; gaurav.mahotra@evanmiller.com	Heather Lennox		4/7/2014	FW: Retiree Solicitation Game Plan - Plain Language	Common Interest Agreement	Documental containing communication with attorney
PRIV_000151	Brader, Valerie					Draft City of Detroit Amended POA: Summary of Pension Treatment and OPEB	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000152	Brader, Valerie	Brader, Valerie (GOV)	West, Samantha (GOV)		4/7/2014	RE: Issue re Pensions	Attorney Client Communication; Deliberative process; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation; Email containing pre-decisional deliberations
PRIV_000153	Brader, Valerie	Stoddard, Phil (DTMB) ; CDeRose@miersfmich.com ; Brader, Valerie (GOV)	Herbach, Michael (DTMB)	Vanden Bosch, Kerrie (DTMB) ; West, Samantha (GOV)	4/7/2014	RE: Confidential: Attorney-Client Privilege	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000154	Brader, Valerie				4/7/2014	Benefits Comparison	Attorney Work Product; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000155	Brader, Valerie	Brader, Valerie (GOV)	Schneider, Matthew (AG)	Stoddard, Phil (DTMB) ; CDeRose@miersfmich.com ; Vanden Bosch, Kerrie (DTMB) ; West, Samantha (GOV) ; Flacher, Steven (AG) ; Herbach, Michael (DTMB) ; Gadola, Michael (GOV) ; Monticello, Frank (AG)	4/7/2014	Re: Confidential: Attorney-Client Privilege	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000156	Brader, Valerie	Brader, Valerie (GOV) ; Saxton, Thomas (Treasury) ; Kester K. So	Steven G. Howell	Gadola, Michael (GOV) ; West, Samantha (GOV)	4/7/2014	RE: Tomorrow	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000157	Brader, Valerie	Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Saxton, Thomas (Treasury) ; Kester K. So ; West, Samantha (GOV)	4/7/2014	Re: Tomorrow	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000158	Brader, Valerie	Clinton, Kevin (TREASURY)	West, Samantha (GOV)	Doyle, Maureen (Treasury); Brader, Valerie (GOV)	4/8/2014	RE: Confidential: Attorney-Client Privilege	Attorney Client Communication; Mediation	Document/femail containing communication with attorney; Document/femail discussing a subject incident to mediation
PRIV_000159	Brader, Valerie	lancse@chadbourne.com; Dubrow, David L.; David G. Heiman; Coleman, Timothy R.	Gerald Rosen	Brader, Valerie (GOV); Gadola, Michael (GOV); Edriker; Elizabeth_Penn; Victoria_Roberts	4/8/2014	Mediators' UTGO settlement statement - rough draft	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000160	Brader, Valerie				4/9/2014	Statement of Detroit Bankruptcy Mediators	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000161	Brader, Valerie	lancse@chadbourne.com; Dubrow, David L.; David G. Heiman; Coleman, Timothy R.	Bjork, Jeffrey E.	Brader, Valerie (GOV); Gadola, Michael (GOV); Edriker; Elizabeth_Penn; Victoria_Roberts	4/8/2014	RE: Mediators' UTGO settlement statement - rough draft	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000162	Brader, Valerie	lancse@chadbourne.com; Dubrow, David L.; David G. Heiman; Coleman, Timothy R.	Gerald Rosen	Brader, Valerie (GOV); Gadola, Michael (GOV); Edriker; Elizabeth_Penn; Victoria_Roberts	4/8/2014	Re: Mediators' UTGO settlement statement - rough draft	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000163	Brader, Valerie	lancse@chadbourne.com; Dubrow, David L.; Coleman, Timothy R.	David G. Heiman	Brader, Valerie (GOV); Gadola, Michael (GOV); Edriker; Elizabeth_Penn; Victoria_Roberts	4/8/2014	RE: Mediators' UTGO settlement statement - rough draft	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000164	Brader, Valerie	David G. Heiman; Gerald Rosen; Bjork, Jeffrey E.; Dubrow, David L.; Coleman, Timothy R.	Larose, Lawrence	Brader, Valerie (GOV); Gadola, Michael (GOV); Edriker; Elizabeth_Penn; Victoria_Roberts	4/8/2014	RE: Mediators' UTGO settlement statement - rough draft	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000165	Brader, Valerie	Larose, Lawrence	Gerald Rosen	Brader, Valerie (GOV); Coleman, Timothy R.; Dubrow, David L.; David G. Heiman; Edriker; Elizabeth_Penn; Victoria_Roberts; tnel@cooley.edu	4/8/2014	RE: Mediators' UTGO settlement statement - rough draft	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000166	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/8/2014	Fwd: UTGO settlement announcement	Attorney Client Communication; Mediation	Document/femail containing communication with attorney; Document/femail discussing a subject incident to mediation
PRIV_000167	Brader, Valerie	Brader, Valerie (GOV)	Herbach, Michael (DTMB)	Stoddard, Phil (DTMB)	4/9/2014	RE: Confidential: Attorney-Client Privilege: Conference Call	Attorney Client Communication; Mediation	Document/femail containing communication with attorney; Document/femail discussing a subject incident to mediation
PRIV_000168	Brader, Valerie	Gadola, Michael (GOV)	Brock Swartzle	Brader, Valerie (GOV); Travis Weber; Brian Mills	4/9/2014	RE: Detroit	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000169	Brader, Valerie	Brock Swartzle	Gadola, Michael (GOV)	Brader, Valerie (GOV); Travis Weber; Brian Mills	4/9/2014	Re: Detroit	Mediation	Document/femail discussing a subject incident to mediation
PRIV_000170	Brader, Valerie	Brader, Valerie (GOV)	Monicello, Frank (AG)	Schneider, Matthew (AG); Elworth, George (AG); Grossi, Christina (AG); Booth, Joshua O. (AG); Herbach, Michael (DTMB); Stoddard, Phil (DTMB)	4/9/2014	CONFIDENTIAL ATTORNEY / CLIENT Questions related to 9:30 phone conference	Attorney Client Communication; Mediation	Document/femail containing communication with attorney; Document/femail discussing a subject incident to mediation
PRIV_000171	Brader, Valerie					Questions Related to Detroit GRS Hybrid Trust	Attorney Work Product; Mediation	Document/femail containing attorney work product; Document/femail discussing a subject incident to mediation
PRIV_000172	Brader, Valerie					Questions related to Detroit GRS Hybrid Plan	Attorney Work Product; Mediation	Document/femail containing attorney work product; Document/femail discussing a subject incident to mediation
PRIV_000173	Brader, Valerie	lukasz@paszek.com; Brader, Valerie (GOV)	Gaurav.Mallotra@sy.com	Jonathan_Siegel@ey.com; Orr_K@deloitte.gov; lheroux@onesday.com; dgheman@onesday.com; emiller@jonesday.com; Juan.Santambrogio@ey.com	4/9/2014	Fw: Estimated Refine Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/femail containing communication with attorney; Document/femail discussing a subject incident to mediation

Privileged Cases Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000174	Brader, Valerie				4/9/2014	Detroit Retirees Stabilization Plan	Common Interest Agreement; Mediation	Documental containing attorney work product; Documental discussing a subject incident to mediation
PRIV_000175	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/9/2014	FW: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000176	Brader, Valerie	Lukasz Paszek	West, Samantha (GOV)	Brader, Valerie (GOV)	4/10/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000177	Brader, Valerie	Brader, Valerie (GOV)	Monticello, Frank (AG)	Schneider, Matthew (AG); Elworth, George (AG); Grossi, Christina (AG); Booth, Joshua O. (AG); Herbach, Michael (DTMB)	4/10/2014	CONFIDENTIAL Attorney Client Privileged	Attorney Client Communication; Mediation	Documental containing attorney work product; Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000178	Brader, Valerie	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV)	Dawn R. Copley	Steven G. Howell; Peter H. Ellsworth; Kester K. So; Allison R. Bach	4/10/2014	Suggested revisions to Disclosure Statement and Plan	Attorney Client Communication	Documental containing communication with attorney
PRIV_000179	Brader, Valerie					Suggested revisions to Disclosure Statement and Plan	Attorney Work Product	Documental containing attorney work product
PRIV_000180	Brader, Valerie	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV)	Allison R. Bach	Steven G. Howell; Peter H. Ellsworth; Kester K. So; Dawn R. Copley	4/10/2014	Summary of Objections to the Amended Disclosure Statement	Attorney Client Communication	Documental containing communication with attorney
PRIV_000181	Brader, Valerie					Summary of Objections to the Amended Disclosure Statement	Attorney Work Product	Documental containing attorney work product
PRIV_000182	Brader, Valerie	Gaurav Malhotra@ey.com	Jonathan Siegel@ey.com	Brader, Valerie (GOV); dghelman@jonesday.com; eric@jonesday.com; itemox@jonesday.com; Juan.Santamaria@ey.com; lukasz@paszek.com; OmR@delnmlt.gov	4/11/2014	Re: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000183	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell	Dawn R. Copley; Allison R. Bach; Kester K. So	4/11/2014	RE: IS Program	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000184	Brader, Valerie	Brader, Valerie (GOV); Priest, Chris (GOV)	Lukasz Paszek		4/11/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000185	Brader, Valerie	Lukasz Paszek	Priest, Chris (GOV)	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000186	Brader, Valerie	Brader, Valerie (GOV)	Priest, Chris (GOV)	Lukasz Paszek	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000187	Brader, Valerie	Brader, Valerie (GOV)	Priest, Chris (GOV)	Lukasz Paszek	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000188	Brader, Valerie	Priest, Chris (GOV)	Lukasz Paszek	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000189	Brader, Valerie	Priest, Chris (GOV)	Lukasz Paszek	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000190	Brader, Valerie	Lukasz Paszek	Priest, Chrs (GOV)	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Refine Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation.
PRIV_000191	Brader, Valerie	Amanda VanDusen ; Brader, Valerie (GOV)	Heather Lemox	Evan Miller ; Kenneth J. Sachs ; Mary M Reil ; Sarah Griffin	4/11/2014	Re: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000192	Brader, Valerie	Heather Lemox	Van Dusen, Amanda	Brader, Valerie (GOV); Evan Miller ; Mary M Reil ; Sachs, Kenneth J. ; Sarah Griffin	4/11/2014	RE: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000193	Brader, Valerie	Van Dusen, Amanda ; Heather Lemox	Sarah Griffin	Brader, Valerie (GOV); Evan Miller ; Mary M Reil ; Sachs, Kenneth J.	4/11/2014	RE: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000194	Brader, Valerie	Sarah Griffin	Mary M Reil	Brader, Valerie (GOV); Evan Miller ; Heather Lemox ; Sachs, Kenneth J. ; Van Dusen, Amanda	4/11/2014	RE: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000195	Brader, Valerie	Dawn R. Copley	Flancher, Steven (AG)	Schneider, Matthew (AG); Steven G. Howell ; Gadola, Michael (GOV); Brader, Valerie (GOV); Peter H. Ellsworth ; Kester K. So	4/11/2014	FW: Suggested revisions to Disclosure Statement and Plan	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000196	Brader, Valerie	Brader, Valerie (GOV)	Schneider, Matthew (AG)	Gadola, Michael (GOV); Steven G. Howell ; Flancher, Steven (AG)	4/11/2014	Re: Draft Pension Trust Legislation	Attorney Client Communication; Attorney Work Product; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000197	Brader, Valerie	Flancher, Steven (AG)	Dawn R. Copley	Schneider, Matthew (AG); Steven G. Howell ; Gadola, Michael (GOV); Brader, Valerie (GOV); Peter H. Ellsworth ; Kester K. So	4/11/2014	RE: Suggested revisions to Disclosure Statement and Plan	Attorney Client Communication	Documental containing communication with attorney
PRIV_000198	Brader, Valerie	Steven G. Howell ; Brader, Valerie (GOV)	Heather Lemox		4/12/2014	Please do not share this	Common Interest Agreement; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000199	Brader, Valerie				4/11/2014	Jones Day 2nd Draft Amended Plan for Adjustment	Common Interest Agreement; Attorney Work Product; Mediation	Documental containing attorney work product; Documental discussing a subject incident to mediation
PRIV_000200	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Steven G. Howell	Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley ; Allison R. Bach	4/13/2014	State Contribution Agreement	Attorney Client Communication; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000201	Brader, Valerie				4/13/2014	Draft of suggested changes to plan provisions related to the state contribution agreement	Common Interest Agreement; Attorney Work Product; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000202	Brader, Valerie				4/13/2014	Draft of Contribution Agreement	Common Interest Agreement; Attorney Work Product; Mediation	Documental containing communication with attorney; Documental discussing a subject incident to mediation
PRIV_000203	Brader, Valerie				4/13/2014	Draft of City of Detroit settlement term sheet for retired Detroit police and firefighters associatio	Attorney Work Product; Mediation	Documental containing attorney work product
PRIV_000204	Brader, Valerie	Brader, Valerie (GOV) ; lukasz@paszek.com	Juan Santambrogio@ey.com	dgherman@JonesDay.com; emiller@JonesDay.com; hlemox@jonesday.com; Jonathan.Siegel@ey.com; Orrk@detrolmi.gov; Gaurav.Mahotra@ey.com	4/14/2014	Re: Fw: Estimated Refine Stabilization Payments (including 20-year projections)	Documental discussing a subject incident to mediation	Documental discussing a subject incident to mediation
PRIV_000205	Brader, Valerie				4/14/2014	2014 estimates of income stabilization payments/Detroit pension recipients	Common Interest Agreement; Mediation	Documental discussing a subject incident to mediation
PRIV_000206	Brader, Valerie	Steven G. Howell ; Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG) ; Flancher, Steven (AG)	Allison R. Bach	Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley	4/14/2014	RE: State Contribution Agreement	Attorney Client Communication; Attorney Work Product	Documental containing communication with attorney
PRIV_000207	Brader, Valerie				4/13/2014	Draft of Contribution Agreement	Attorney Work Product; Mediation	Documental containing attorney work product

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000208	Brader, Valerie	ork@detroitmi.gov; nowling@denirolmi.gov; Tedder, Greg (GOV); Brader, Valerie (GOV); Stowell@dickinson- wright.com	Heather Lemox	Jennifer L. Seidman; Thomas A Wilson	4/13/2014	Draft of Contribution Agreement	Attorney Work Product; Mediation	Document/attorney containing attorney work product
PRIV_000209	Brader, Valerie				4/15/2014	CONFIDENTIAL	Common Interest Agreement; Attorney Work Product	
PRIV_000210	Brader, Valerie				4/15/2014	Attachment/Second Amended Plan for the adjustment of debts of the city of Detroit – summary of material changes	Common Interest Agreement	Document/attorney containing attorney work product
PRIV_000211	Brader, Valerie	Brader, Valerie (GOV); Priest, Chris (GOV)	Lukasz Paszek		4/15/2014	FW: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000212	Brader, Valerie	Brader, Valerie (GOV)	Priest, Chris (GOV)	Lukasz Paszek	4/15/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000213	Brader, Valerie	Brader, Valerie (GOV); Priest, Chris (GOV)	Lukasz Paszek		4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000214	Brader, Valerie	Brader, Valerie (GOV); Steven G. Howell; Kester K. So; Schneider, Matthew (AG); Flacher, Steven (AG); PDLsworth@dickinson- wright.com; Dawn R. Copley; Allison R. Bach (ABach@dickinson-wright.com)	Gadola, Michael (GOV)		4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/attorney containing attorney work product; Document/attorney containing communication with attorney; Document/attorney discussing a subject incident to mediation
PRIV_000215	Brader, Valerie	Lukasz Paszek	Priest, Chris (GOV)	Brader, Valerie (GOV)	4/15/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000216	Brader, Valerie	Steven G. Howell; Brader, Valerie (GOV); Kester K. So; Schneider, Matthew (AG); Flacher, Steven (AG); Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	Gadola, Michael (GOV)		4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Mediation	Document/attorney containing communication with attorney
PRIV_000217	Brader, Valerie	Brader, Valerie (GOV)	Juan Santambrogio@ey.com	dgheman@jonesday.com; emiller@jonesday.com; Gaurav Malhotra@ey.com; hiennox@jonesday.com; Jonathan.Siege@ey.com; lukasz@jasek.com; Ornk@detroitmi.gov; Priest, Chris (GOV)	4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000218	Brader, Valerie	Heather Lemox; Thomas A Wilson	Steven G. Howell	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flacher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	4/15/2014	State Contribution Agreement	Attorney Client Communication	
PRIV_000219	Brader, Valerie				4/13/2014	Draft of Contribution Agreement	Attorney Work Product; Mediation	Document/attorney containing attorney work product
PRIV_000220	Brader, Valerie				4/15/2014	Notes on State Contribution Agreement	Attorney Work Product; Mediation	Document/attorney containing attorney work product
PRIV_000221	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000222	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000223	Brader, Valerie	Heather Lemox	Steven G. Howell	Brader, Valerie (GOV)	4/15/2014	RE: State Contribution Agreement	Common Interest Agreement; Mediation	Document/attorney containing communication with attorney; Document/attorney discussing a subject incident to mediation
PRIV_000224	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: State Contribution Agreement	Mediation	Document/attorney discussing a subject incident to mediation
PRIV_000225	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: State Contribution Agreement	Mediation	Document/attorney discussing a subject incident to mediation

Privileged Dates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000226	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Pazeck		4/15/2014	RE: State Contribution Agreement	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000227	Brader, Valerie	Durfee, Sally (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	4/15/2014	FW: Legislative letter	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000228	Brader, Valerie	Mary M Reil	Steven G. Howell	Brader, Valerie (GOV)	4/15/2014	Re: Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing communication with attorney
PRIV_000229	Brader, Valerie	Steven G. Howell	Mary M Reil	Brader, Valerie (GOV)	4/15/2014	Re: Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing communication with attorney
PRIV_000230	Brader, Valerie				4/16/2014	Notes on Major additions/changes to City of Detroit plan of adjustment	Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000231	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell	Allison R. Bach	4/16/2014	FW: Call re: State Contribution Agreement - Dial-in information	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000232	Brader, Valerie	Steven G. Howell	Allison R. Bach	Brader, Valerie (GOV)	4/16/2014	Re: Call re: State Contribution Agreement - Dial-in information	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000233	Brader, Valerie	Brader, Valerie (GOV); Heather Lennox	Steven G. Howell	Mary M Reil; David G. Heiman; Gaurav Mahotra; Jennifer L. Seidman; Juan Santibagno	4/16/2014	RE: Call re: State Contribution Agreement - Dial-in information	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/Email containing attorney work product
PRIV_000234	Brader, Valerie	Steven G. Howell; Brader, Valerie (GOV)	Gordon, Robert D.	David G. Heiman; Evan Miller; Heather Lennox; Michael J. VanOverbeke; Turner, Joseph E., Jr.; King, Ronald A.	4/16/2014	Detroit: RSCD governance	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000235	Brader, Valerie				4/16/2014	Material prepared for mediation	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000236	Brader, Valerie				4/16/2014	Material prepared for mediation	Mediation	
PRIV_000237	Brader, Valerie				4/16/2014	Communication from Keyvin Orr to Mike Duggan regarding revised language pertaining to privatization of City services	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000238	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV)	Brook Swartzle	Brian Mills; Scott Starr; Travis Weber	4/16/2014	Detroit	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000239	Brader, Valerie	Wurfel, Sara (GOV)	Jennifer L. Seidman	Brader, Valerie (GOV); Tedder, Greg (GOV); Heather Lennox; Thomas A. Wilson	4/16/2014	FW: Detroit - Filed Versions	Common Interest Agreement; Mediation	Document/Email containing communication with attorney; Document/Email discussing a subject incident to mediation
PRIV_000240	Brader, Valerie	Brook Swartzle; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Brian Mills; Scott Starr; Travis Weber; West, Samantha; Tedder, Greg (GOV); Kester K. So; Steven G. Howell	4/16/2014	RE: Detroit	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000241	Brader, Valerie	Mike Duggan	Keyvin Orr	Stacy Fox; dgheiman@jonesday.com; emiller@jonesday.com; hlennox@jonesday.com; Brader, Valerie (GOV)	4/16/2014	FW: Detroit - AFSCME Tentative Agreement (revised Privatization Language)	Mediation	Document/Email discussing a subject incident to mediation
PRIV_000242	Brader, Valerie				4/16/2014	Communication from Keyvin Orr to Mike Duggan regarding revised language pertaining to privatization of City services	Mediation	
PRIV_000243	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell	Gadola, Michael (GOV); Deborah L. Graue; Kester K. So; Peter H. Elsworth; Dawn R. Copley; Allison R. Bach	4/16/2014	Revised Draft of the Investment Committee Governance Term Sheet	Attorney Client Communication; Mediation	Document/Email discussing a subject incident to mediation
PRIV_000244	Brader, Valerie	Brader, Valerie (GOV); Schneider, Matthew (AG); Gadola, Michael (GOV); Fletcher, Steven (AG)	Allison R. Bach	Gustafson, Holly (AG); Steven G. Howell; Dawn R. Copley; Kester K. So; Peter H. Elsworth	4/16/2014	Second Amended Plan and Disclosure Statement	Common Interest Agreement; Mediation	Document/Email containing communication with attorney; Document/Email discussing a subject incident to mediation
PRIV_000245	Brader, Valerie	Gadola, Michael (GOV)	Brook Swartzle	Brader, Valerie (GOV); Brian Mills; Scott Starr; Travis Weber; West, Samantha (GOV); Tedder, Greg (GOV); Kester K. So; Steven G. Howell	4/16/2014	Re: Detroit	Mediation	Document/Email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000246	Brader, Valerie	Kester K. So; Steven G. Howell; Brader, Valerie (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Acderman, Darin (GOV); Durfee, Sally (GOV)	4/17/2014	FW: Settlement Appropriations	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000247	Brader, Valerie	Kester K. So; Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Durfee, Sally (GOV); Acderman, Darin (GOV)	4/17/2014	FW: Detroit	Mediation	
PRIV_000248	Brader, Valerie	Brader, Valerie (GOV)	West, Samantha (GOV)	Gadola, Michael (GOV)	4/17/2014	FW: FINAL Revised Draft of the Investment Committee Governance Term Sheet	Attorney Client Communication; Mediation	
PRIV_000249	Brader, Valerie				4/16/2014	Draft of City of Detroit settlement term sheet for retired Detroit police and firefighters association	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000250	Brader, Valerie				4/17/2014	Draft of City of Detroit settlement term sheet for retired Detroit police and firefighters association	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000251	Brader, Valerie	Baird, Richard (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV)	4/18/2014	FW: Notice of mediation session - Subject to Mediation Confidentiality and Privilege	Mediation	Document/email discussing a subject incident to mediation
PRIV_000252	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV)	Steven G. Howell		4/18/2014	FW: Notice of mediation session - Subject to Mediation Confidentiality and Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000253	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/18/2014	FW: Confidential: Fw: Privileged and Confidential Mediation Confidentiality and Privilege Attorney-Client Communication (Outsourcing)	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000254	Brader, Valerie				4/18/2014	City of Detroit GRS Coalition template agreement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000255	Brader, Valerie	Clinton, Kevin (TREASURY); Sibitz, Brom (Treasury); Saxon, Thomas (Treasury); Tedder, Greg (GOV); ork@detriam.gov; mayss@detriam.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B. Elman	Charles M. Moore; gaurav.mahotra@ey.com; ken.buckline@millerbuckline.com; David G. Heiman; Corinne Bat; Heather Lennox; Bruce Bennett	4/20/2014	City of Detroit Restructuring - Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000256	Brader, Valerie	Priest, Chris (GOV); Brader, Valerie (GOV)	Tedder, Greg (GOV)		2/12/2014	FW: (NEWS RELEASE) IMPORTANT NOTICE TO ALL CITY RETIREES: Feb. 15 is Deadline to Sign Up Health Coverage for Non-Medicare Eligible Retiree	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000257	Brader, Valerie	Brader, Valerie (GOV); Priest, Chris (GOV)	Tedder, Greg (GOV)		2/12/2014	RE: (NEWS RELEASE) IMPORTANT NOTICE TO ALL CITY RETIREES: Feb. 15 is Deadline to Sign Up Health Coverage for Non-Medicare Eligible Retiree	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000258	Brader, Valerie	Tedder, Greg (GOV); Brader, Valerie (GOV)	Acderman, Darin (GOV)		2/7/2014	FW: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000259	Brader, Valerie	Steven G. Howell; Gadola, Michael (GOV); Brader, Valerie (GOV)	Gordon, Robert D.	Bradley A. Robins; Eric Mendelsohn; Michael J. VanOverbeke; Turner, Joseph E., Jr.; King, Ronald A.	2/11/2014	Detroit Retirement Systems' POA issue analysis	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000260	Brader, Valerie				1/21/2014	Plan of adjustment consideration on behalf of the retirement systems of the city of Detroit	Attorney Client Communication; Attorney Work Product; Deliberative process; Mediation	Document/email containing communication with attorney
PRIV_000261	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Fletcher, Steven (AG)	Steven G. Howell		2/13/2014	FW: Materials For Governor's Team - confidential settlement information Rule 408	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000262	Brader, Valerie				2/13/2014	Lazard Presentation Materials	Mediation	Document/email discussing a subject incident to mediation